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June 30, 2025

VIA ECF

The Honorable Jennifer L. Rochon
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

Re: *Hurlock v. Kelsier Ventures et al., No. 1:25-cv-03891-JLR (S.D.N.Y. 2025)*

Dear Judge Rochon:

We write on behalf of the Steering Group of Claimants in the Action *Palladian Partners L.L.P. v. The Republic of Argentina*, [2023] EWHC 000010 (Comm.) (Eng.) (the “Claimants”), judgment creditors of the Republic of Argentina (the “Republic”), to respectfully request access to observe the Microsoft Teams hearing scheduled for July 1, 2025 at 11:00 a.m. (see also ECF No. 52)

As the Second Circuit has emphasized, there is a “presumption of access” to judicial proceedings. This presumption “is based on the need for federal courts ... to have a measure of accountability and for the public to have confidence in the administration of justice [P]ublic monitoring is an essential feature of democratic control.” *United States v. Amodeo*, 71 F.3d 1044, 1048 (2d. Cir. 1995). Claimants hold a judgment against the Republic, a non-party here, who is averred to have a beneficial ownership interest in certain cryptocurrency assets currently subject to this Court’s Temporary Restraining Order (ECF No. 19). The Claimants’ judgment against the Republic is final, conclusive, and enforceable in the United Kingdom, and Claimants have recently commenced recognition and enforcement proceedings against the Republic in the United States District Court for the District of Columbia, *see Palladian Partners, L.P. et al v. The Republic Of Argentina*, No. 1:25-cv-1954-CKK (June 23, 2025), ECF No. 1 (Complaint); 1-6 (Supreme Court of the United Kingdom Denial of Further Appeals).

Given the presumption of access and Claimants’ interest in the frozen assets, we respectfully request permission to observe the proceedings.

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Respectfully submitted,

/s/ David M. Orta

David M. Orta

cc: All counsel of record (via ECF)